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6 **IN THE UNITED STATES DISTRICT COURT**
7 **FOR THE DISTRICT OF ARIZONA**

8 CARRIE FERRARA CLARK,

9 Plaintiff,

10 vs.

11 CITY OF TUCSON,

12 Defendant.
13

Case No. 4:14-CV-02543-TUC-CKJ

**STIPULATION REGARDING JUROR
QUESTIONNAIRE**

Hon. Cindy K. Jorgenson

14 Pursuant to the Court’s direction on February 4, 2019, the parties met and conferred
15 and submit the attached stipulated Juror Questionnaire to be used at trial.
16

17 DATED this 13th day of February, 2019.

18 **MICHAEL G. RANKIN**
19 City Attorney

20 s/ Renee Waters
21 Renee Waters
22 Principal Assistant City Attorney

JACOBSON LAW FIRM

s/ Jeffrey H. Jacobson
Jeffrey H. Jacobson
Attorney for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on February 13, 2019, I electronically transmitted the attached document to the Clerk’s Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing to the following CM/ECF registrants:

Michelle Saavedra
Renee Waters
Principal Assistant City Attorneys
Office of the City Attorney, Civil Division
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Attorneys for Defendant

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JUROR QUESTIONNAIRE

To assist the Court and the parties, please provide full and complete responses to the following requests for information. This should help streamline the jury selection process.

Your Name: _____

Background of the Case

This is a civil lawsuit in which Plaintiff Carrie Clark alleges that the City of Tucson, her employer, failed to provide adequate lactation facilities, as required by federal law, for Mrs. Clark to express breastmilk for her newborn son. Ms. Clark alleges that she was discriminated against based on her gender and when she complained about her working conditions, the City retaliated against her. The City denies Plaintiff's claim and asserts that Tucson Fire Department's facilities were legally adequate.

Questions for Prospective Jurors

The following series of questions is designed to address beliefs or attitudes you may hold about issues that may be relevant to this case. The answers you provide are confidential and will not part of the public record in this case.

1. If you are a woman with a child, did you breastfeed, for any period of time, when your child was a baby? _____

2. If you are a woman who answered yes to Question 1, did you also engage in "pumping" during the time you were breastfeeding your baby?

3. If you are a man with a child, did your wife/partner breastfeed, for any period of time, when your child was a baby?

4. If you are a man who answered yes to Question 3, did your wife/partner also engage in "pumping" during the time she was breastfeeding your baby?

5. If you have a baby, did you/your wife choose to use formula exclusively rather than breastfeeding?

6. Do you believe women should stay home with their infants, rather than returning to work, if they are breastfeeding?

7. Do you believe it is appropriate to give women who do return to work while breastfeeding special consideration in the workplace?

8. Do you believe it is appropriate for a woman to breastfeed in public?

9. Have you worked at a job where a co-worker was provided time and facilities to express breastmilk?

10. Have you ever worked as a lactation consultant?

11. Have you ever worked for, volunteered with, or given money to any organization whose purpose is to promote breastfeeding, including but not limited to La Leche League? If yes, how recently?

12. Are you uncomfortable sitting on a jury that will involve testimony about breastfeeding and/or pumping breast milk?
